

Remarks**I. Examiner Interview**

Applicant's attorneys appreciate the Examiner's courtesy in speaking with them on June 25, 2008, regarding the outstanding office action. The interview included discussion of the rejections made by the Examiner, the Matsumoto reference (U.S. Patent No. 6,333,998), and proposed amendments to the claims. Agreement was reached with respect to the proposed amendments and Applicant submits that the comments below reflect the substance of the interview.

II. Status

Claims 1, 11, 18, and 28 have been amended. The amendments are supported by the specification. No new matter has been added as a result of the amendments. Claims 1-37 are currently pending.

III. Rejections under 35 U.S.C. § 103

Claims 1-37 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Oikawa (Japan Patent No. 05167850A), and in view of Matsumoto (U.S. Patent No. 6,333,998) ("Oikawa-Matsumoto combination"). Amended independent Claims 1, 11, 18, and 28 recite a "predetermined pattern optimized to minimize scattering of toner on a media caused by ventilation of gas and water vapor". Applicant respectfully submits that the Oikawa-Matsumoto combination does not teach at least this feature. In addition, Applicant respectfully submits that none of the cited references, either alone or in combination, teach this feature.

As acknowledged in the Office Action, Oikawa does not teach a predetermined pattern having an undesirable toner placement, instead relying on Matsumoto for this teaching. Matsumoto teaches converting a multilevel digital image signal to a bilevel image of black and white pixels. (Matsumoto, col. 5, ll. 29-33). In the conversion, the resulting bilevel image may include a discontinuous line that was previously a fine line in the multilevel digital image. (Matsumoto, col. 8, ll. 49-55). Specifically, the conversion uses pseudo-half-tone processing to express halftones at the boundary between black and white pixels of the multilevel digital image. (Matsumoto, col. 8, ll. 49-55; col. 1, ll. 29-36). After conversion, Matsumoto teaches that the bilevel image is compared to reference patterns to determine whether pixel substitution should occur. (Matsumoto, col. 5, ll. 41-52). The

reference patterns in Matsumoto are not predetermined patterns optimized to minimize scattering of toner on a media caused by ventilation of gas and water vapor, as recited in Claims 1, 11, 18, and 28. The reference patterns in Matsumoto are only patterns which are compared to bilevel images that may contain a discontinuous line. Claims 1, 11, 18, and 28 are therefore patentable for at least the above reasons. In addition, dependent Claims 2-10, 12-17, 19-27, and 29-37 are patentable at least because they depend from their respective allowable independent base claims.

Dependent Claims 9, 17, 26, and 36 recite that the predetermined pattern of pixel values and its corresponding pcode grid applies to a first color and a second predetermined pattern of pixel values and its corresponding pcode grid applies to a second color. The Office Action asserts that Claim 9 is disclosed by Oikawa, specifically, paragraphs 16-18. The Office Action also asserts that Claims 17, 26, and 36 recite similar limitations as Claim 9, and rejects them on the same basis. The Oikawa-Matsumoto combination, even if made, does not teach these features. Instead, the cited portion of Oikawa discloses applying a cruciform memory pattern to a graphic pattern, and then comparing the memory pattern conforming to part of the graphic pattern to the memory pattern after it is moved one pixel over on part of the graphic pattern. (Oikawa, ¶¶ 0016-0018). Oikawa does not teach or suggest that a predetermined pattern of pixel values and its corresponding pcode grid applies to a first color and a second predetermined pattern of pixel values and its corresponding pcode grid applies to a second color, as recited in Claims 9, 17, 26, and 36. Therefore, Claims 9, 17, 26, and 36 are also patentable for at least these reasons.

IV. Summary

It is respectfully asserted that all of the pending claims are patentable over the cited references, and allowance of the pending claims is earnestly solicited. If the Examiner believes that a further telephone interview would be helpful in resolving any outstanding issues, the Examiner is respectfully invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

/Amir N. Penn/

Amir N. Penn - Reg. No. 40,767
Anthony Y. Wen
Attorneys for Applicant

BRINKS HOFER GILSON & LIONE
P.O. Box 10395
Chicago, IL 60610
(312) 321-4200